-ATTACHMENT 2

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template EB Docket 06-36

AH	riual 64.2009(e) CPNI Certification for 2010 Lovering the prior calendar year 2010
<b>1</b> .	Date filed: 2.26.10
2.	Name of company(s) covered by this certification: V/R TUAL VOICE VERA TILITY LL
3	Form 199 Filer ID: -277 469
4.	Name of signatory: YUVAL BNA-5#
5.	Title of signatory: CEO
	Certification:
est	certify that I am an officer of the company named ove, and acting as an agent of the company, that I have personal knowledge that the company has ablished operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. e 47 C.F.R. § 64.2001 et seq.
CP	Attached to this certification is an accompanying statement explaining how the company's procedures sure that the company is in compliance with the requirements (including those mandating the adoption of NI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the mmission's rules.
bro	The company HAS NOT aken actions (i.e., proceedings instituted or petitions filed by a company either state commissions, the court system, or at the Commission against data brokers) against data okers in the past year. [NOTE: If you reply in the affirmative, please provide an explanation of any actions against data brokers.]
e.g	The company HMS NOT received customer complaints in the past year concerning the authorized release of CPNI [NOTE: If you reply in the affirmative, please provide a summary of such applaints. This summary should include number of complaints, broken down by category or complaint, in instances of improper access by employees, instances of improper disclosure to individuals not thorized to receive the information, or instances of improper access to online information by individuals not thorized to view the information.]
fals	The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 ich requires truthful and accurate statements to the Commission. The company also acknowledges that se statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code it may subject it to enforcement action.

Attachments:

Signed

Accompanying Statement explaining CPNI procedures Explanation of actions taken against data brokers (if applicable)

Summary of customer complaints (if applicable)

No. of Copies re. : List ABCDE



February, 2010

## Internal CPNI Procedures

Pursuant to federal requirements, V3 Communications (V3) has developed and implemented an internal software system to flag and track access to Digital Voice service customer records that contain CPNI, and has instituted employee training programs to educate customer service and other employees who may have access to CPNI regarding how and when they may use CPNI. V3 maintains an electronic audit mechanism to track all access to customer account information. Federal law prohibits V3 from releasing call detail information and/or records in any manner other than emailing it to customer provided email account of record V3 also notifies its clients of any attempted changes to their account information.